

# **EXHIBIT S**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

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IN RE: NATIONAL PRESCRIPTION MDL No. 2804  
OPIATE LITIGATION

Case No.  
17-md-2804

Judge Dan Aaron  
Polster

This document relates to:

The County of Cuyahoga v. Purdue Pharma, et  
al., Case No. 17-OP-45004

City of Cleveland, Ohio v. Purdue Pharma L.P.,  
et al., Case No. 18-OP-45132

The County of Summit, Ohio, et al. v. Purdue  
Pharma L.P., et al., Case No. 18-OP-45090

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Videotaped Deposition of  
HYLTON E. BAKER  
December 19, 2018  
9:08 a.m.

Taken at:  
Sheraton Suites Akron  
1989 Front Street - Portage Room  
Cuyahoga Falls, Ohio

Stephen J. DeBacco, RPR

1 MR. BREWER: You have Matt Brewer  
2 from Walgreens from the firm Bartlit Beck.

3 HYLTON E. BAKER, of lawful age, called  
4 for examination as provided by the Federal  
5 Rules of Civil Procedure, being by me first  
6 duly sworn, as hereinafter certified, deposed  
7 and said as follows:

8 EXAMINATION OF HYLTON E. BAKER  
9 BY MS. SAULINO:

10 Q. Good morning, Captain Baker.

11 A. Good morning.

12 Q. As you just heard, my name is  
13 Jennifer Saulino, and I'm with the law firm of  
14 Covington & Burling, and we represent McKesson  
15 Corporation, which is one of the defendants in  
16 this action.

17 Could you please just state and  
18 spell your full name for the record?

19 A. Yes. First name is Hylton,  
20 H-y-l-t-o-n; middle initial E.; last name is  
21 Baker, B-a-k-e-r.

22 Q. And could you state your address  
23 for the record, please?

24 A. It is 3226 Wright, W-r-i-g-h-t,  
25 Road Northwest, Uniontown, one word, Ohio

1 44685.

2 Q. And you are currently retired; is  
3 that correct?

4 A. That is correct.

5 Q. Do you -- although you are retired  
6 from the sheriff's department, are you working  
7 in any other capacities right now?

8 A. Yes, I am.

9 Q. What are you doing?

10 A. I work as a supervisor for Dunbar  
11 Brinks.

12 Q. And what do you do in that  
13 capacity?

14 A. I move money from one place to  
15 another.

16 Q. Okay. As a supervisor, do you --  
17 are you actually in the trucks, or do you sit  
18 in an office?

19 A. Both.

20 Q. Both? Okay. And that's here in  
21 Northeastern Ohio?

22 A. Yes.

23 Q. And you retired from the sheriff's  
24 office in late 2012; is that right?

25 A. I retired in November of 2012.

1 has sued Walgreens, Rite Aid, and CVS?

2 A. I saw those in the complaint also.

3 Q. Do you have any personal knowledge  
4 as to why Summit County has sued Walmart?

5 A. Other than what I read in the  
6 complaint, no.

7 Q. What about Walgreens, Rite Aid, or  
8 CVS? Do you have any personal knowledge as to  
9 why Summit County sued those entities?

10 A. Other than what I saw in the  
11 complaint, no.

12 Q. I take it you can't point to any  
13 specific conduct by Walmart relating to  
14 prescription opioids that caused any monetary  
15 losses to Summit County?

16 A. During my tenure, I don't have any.

17 Q. And is the same true for Walgreens,  
18 Rite Aid, and CVS?

19 A. Correct.

20 Q. Are you familiar with the damages  
21 that Summit County is seeking in this case?

22 A. I know they're seeking damages. I  
23 don't know what they are and what the amounts  
24 are.

25 Q. Have you personally ever tried to